

**IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

In re:

JURGITA PAULASKAS
fka JURGITA SRIUBENAITE;

Debtor.

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Chapter 7
Case No. 18-08572
Honorable A. Benjamin Goldgar

NOTICE OF MOTION

TO: See attached service list

PLEASE TAKE NOTICE that on July 13, 2018, at 1:00 p.m. or as soon thereafter as counsel may be heard, I shall appear before the Honorable A. Benjamin Goldgar or any judge sitting in his stead, in the courtroom usually occupied by him at 1792 Nicole Lane, Round Lake Beach, IL 60073, and move to present the attached Motion To Extend Time To Object To Discharge and Dischargeability.

MARIYA MANDRA

By: /s/ Vincent L. DiTommaso
One of her Attorneys

Dated: June 22, 2018

Vincent L. DiTommaso
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**IN THE UNITED STATES BANKRUPTCY COURT
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In re:

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MOTION TO EXTEND TIME TO OBJECT TO DISCHARGE AND DISCHARGEABILITY

Mariya Mandra (“Mandra”), by and through her undersigned attorneys, for her Motion to Extend Time to Object to Discharge and Dischargeability pursuant to Bankruptcy Rules 4004(b) and 4007(c), respectfully states as follows:

1. Jurgita Paulauskas f/k/a Jurgita Sriubenaite (“Debtor”) filed her Voluntary Petition for Relief under Chapter 7 on March 24, 2018.
2. The first date set for the section 341 creditors’ meeting was April 26, 2018. The deadline to file a complaint to determine the dischargeability of the Debtor’s debts or to oppose the Debtor’s discharge in this case is June 25, 2018. The time period for filing an objection to discharge has not expired as of the date and time of the filing of this Motion.
3. Mandra and Debtor’s husband, Andrius Paulauskas, are co-owners of and equal shareholders in an Illinois corporation named 777 Transport, Inc. In 2017, Mandra filed a Verified Shareholder Derivative Complaint against Andrius Paulauskas and 777 Transport, Inc. in the U.S. District Court for the Northern District of Illinois.¹ The Complaint alleges claims for breach of contract, breach of fiduciary duty, and claims under the Illinois Business Corporation Act, 805 ILCS 5/12.56 *et seq.*

¹ The case is captioned *Mariya Mandra, individually and derivatively on behalf of 777 Transport, Inc. vs. Andrius Paulauskas and 777 Transport, Inc.*, Case No. 17-cv-01917.

4. Mandra and her husband are citizens of Lithuania who were interested in investing in an American transportation company (for both the potential immigration benefits and because Mandra and her husband had education and experience in shipping and logistics). The allegations of the Complaint arise out of Andrius Paulauskas's solicitation of a \$1,000,000 investment from Mandra, which in 2015, Mandra paid in exchange for a 50% ownership in 777 Transport Inc. Mandra alleges that after the stock purchase was complete and the \$1,000,000 had been transferred to 777 Transport Inc., she was quickly frozen out of the business and the proceeds of her investment (among other corporate assets) were converted by Mr. Paulauskas for his personal benefit.

5. Discovery in that case is ongoing. Ms. Mandra continues to investigate Mr. Paulauskas's allegedly fraudulent conduct and whether any other parties participated in it or received the financial proceeds of it.

6. Mandra did not receive notice of Debtor's bankruptcy petition and is not listed as a creditor. Mandra learned of the pendency of this proceeding on or around June 11, 2018.

7. As a result of information contained in the Debtor's bankruptcy schedules, information learned in the pending suit against Debtor's husband (described above), and the scope of further information needed from the Debtor, Mandra requires additional time to continue her investigation into the Debtor's assets in order to determine whether she has a basis upon which to object to the dischargeability of the Debtor's debt pursuant to Section 523 of the Bankruptcy Code or to the Debtor's discharge pursuant to Section 727 of the Bankruptcy Code.

8. Accordingly, Mandra requests an additional 90 days from June 25, 2018, the present discharge date, through and including September 24, 2018, for objections to discharge and dischargeability. A draft order is attached hereto as Exhibit 1.

WHEREFORE, Mariya Mandra, respectfully prays for the entry of an Order in substantially the same form as Exhibit 1 extending the last day to object to discharge/dischargeability to and including September 24, 2018, and for such further relief as this Court deems necessary and just.

MARIYA MANDRA

By: /s/ Vincent L. DiTommaso
One of her Attorneys

Dated: June 22, 2018

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CERTIFICATE OF SERVICE

I, Vincent L. DiTommaso, an attorney, certify that on June 22, 2018, a copy of the foregoing Notice of Motion and Motion To Extend Time To Object To Discharge and Dischargeability was served on the foregoing individuals as follows:

Via the Court's Electronic Notice for Registrants:

Patrick S. Layng
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312-886-5785
U.S. Trustee

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Chapter 7 Trustee

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Counsel for Debtor

Via First Class Mail:

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Deerfield, IL 60015
Debtor

/s/ Vincent L. DiTommaso